



STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
744 P Street • Sacramento, CA 95814 • www.cdss.ca.gov



EDMUND G. BROWN JR.
GOVERNOR

September 7, 2017

Mr. Mike Miller, Director
San Joaquin County Human Services Agency
102 San Joaquin Street
P. O. Box 201056
Stockton, CA 95201-3006

Dear Mr. Miller:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of June 2017. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Daniel Cervantes at (916) 654-2107. You may also contact us by e-mail at crb@dss.ca.gov.

Sincerely,

Original signed by Laurie Mosher

LAURIE MOSHER, Acting Manager
Civil Rights Unit
Family Engagement and Empowerment Division

Enclosure

c: Melissa Sangalang, Civil Rights Coordinator

Kim McCoy Wade, Chief
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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
San Joaquin County
Human Services Agency**

**Conducted on
June 12 – 16, 2017**

**California Department of Social Services
Human Rights and Community Services Division**

Civil Rights Unit

744 P Street, M.S. 8-16-70

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**Reviewer:
Daniel Cervantes**

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Unit (CRU) staff was to assess the San Joaquin County Human Services Agency with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted June 12, 2017 to June 16, 2017. An exit interview was held on June 16, 2017, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
San Joaquin Human Services Agency	102 S. San Joaquin St. Stockton, CA 95202	All Programs	Spanish
CalWORKS Employment Center	900 E. Oak St., 2 nd Fl. Stockton, CA 95202	CalWORKs	Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2016/17 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of civil rights coordinator
- Survey of program managers

- Case file reviews
- Facility inspections
- Discussion with community advocate groups. In this review, no organization(s) were contacted for feedback.

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility accessibility for individuals with disabilities
- Program accessibility for clients with disabilities (physical, mental, learning, visual or hearing impairment, etc.)
- Bilingual staffing/services for non-English-speaking clients
- Documentation of client case records
- Staff development and training
- Discrimination complaint procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	6	5
Children Social Workers	3	2
Adult Program Workers	3	2
Receptionist/Screeners	6	5
Total	18	14

Civil Rights Coordinator and Program Manager Surveys

Number of surveys distributed	5
Number of surveys received	5

Reviewed Case Files

English speakers' case files reviewed	8
Non-English or limited-English speakers' case files reviewed	75
Languages of clients' cases	Vietnamese, Spanish, Cambodian, Lao, Cantonese,

	Tagalog, Armenian, Ilocano, Hmong, Portuguese, ASL
Reasonable Accommodation Cases	5

Sections III through IX of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section X evaluates the county's Call/Service Centers services provided to non-English speaking clients and clients with a disability.

Section XI reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section XII highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XIII of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Comments
Does the county accommodate clients by flexing/extending their hours or allowing applications to be mailed in?	Yes		San Joaquin HSA clients can apply for benefits online. The county also makes accommodations for working clients by providing early morning and evening hours as necessary.

Access to Services, Information and Outreach	Yes	No	Comments
			They can also mail applications in when necessary.
Can clients, including those with disabilities, access services when unable to go to the office?	Yes		Accommodations can be made for clients on an as needed basis.
Does the county ensure the awareness of available services for individuals in remote areas?	Yes		San Joaquin HSA has remote offices in Tracy and French Camp that allow clients access to services. Further, the county also provides brochures, pamphlets, and posters at a variety of events/locations within the county. Information is also available from the San Joaquin County HSA website, at hospitals, and other San Joaquin County public offices.

Signage, posters, pamphlets	Yes	No	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 8/16)?	Yes		The most recent version of the PUB 13 pamphlet was displayed in various languages in all lobbies visited. Further, all receptionists and workers were able to produce the PUB 13 in Braille, large print, and audio.
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes		All workers stated that they are aware of the importance and distribution of the PUB 13 at intake and re-certification.
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian	Yes		The most recent version of the PUB 13 pamphlet was displayed in various languages in all lobbies visited.

Signage, posters, pamphlets	Yes	No	Comments
Spanish, Tagalog, Ukrainian, and Vietnamese?			
Is the Pub 13 available in large print (English and Spanish), CD, and Braille?	Yes		All lobbies visited had the most recent version of the large print, CD, and Braille.
Were the current versions of the required posters present in the lobbies?	Yes		
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	Yes		All instructional and directional signs posted in waiting areas were in the threshold languages.

B. Corrective Actions

None

The county is required to use the latest version of each of the referenced documents. For your information, the most recent version for each of the above referenced documents is:

Pub 13	"Your Rights under California Welfare Programs"	08/16
Pub 86	"Everyone is Different, but Equal Under the Law"	03/07
Form AD 475B	"And Justice for All"	12/99

Contact the Civil Rights Unit to receive the most recent versions, or download the Pub 13 from the CRU website

<http://www.cdss.ca.gov/civilrights/entres/forms/English/pub13.pdf>.

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication

barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: 102 S. San Joaquin St. Stockton, CA 95202

No findings at this location.

2. Facility Location: 900 E. Oak St., 2nd Fl. Stockton, CA 95202

No findings at this location.

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual

applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages if the forms and materials are provided by CDSS in that language, and that information inserted in Notices of Action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Comments
Does the county identify a client's language need upon first contact? How?	Yes		A large percentage of the community served by San Joaquin County HSA are Spanish speaking. The county does a great job of providing Spanish speaking employees for immediate interpretive services. Other languages are also accommodated expeditiously with the help of the I SPEAK card and the county's contracted language line.
Does the county use a primary language form?	Yes		San Joaquin County HSA uses Form SJ100.
Does the client self-declare on this form?	Yes		Client selects their preferred written and spoken language, then signs and dates on the back of the form.
Are non-English- or limited-English-speaking clients provided bilingual services?	Yes		Spanish speakers are assigned a Spanish speaking worker. Other

Question	Yes	No	Comments
			languages are offered county certified interpreters (or the language line) in their preferred language as needed.
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?		No	San Joaquin County HSA has many bilingual workers that serves the majority of the population. Also, San Joaquin HSA has a contract with Certified Languages International to provide translation services over the phone.
Does the county have a contracted language line provider, a county interpreter list, or any other interpreter process?	Yes		San Joaquin County HSA is contracted with Certified Languages International.
Is there a delay in providing interpretive services?		No	Interpretive Services were provided upon contact.
Are county interpreters certified?	Yes		Bilingual workers must be certified through the county.
Does the county have adequate interpreter services?	Yes		In most situations, San Joaquin County can provide the interpretive service in house.
Does the county allow minors to be interpreters? If so, under what circumstances?		No	None of the workers interviewed stated that they allow minors to interpret.
Does the county allow the client to provide his or her own interpreter?	Yes		Client's that request to use their own interpreter must submit form HSA 31 (Non HSA Interpreter).
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes		County workers make an early determination as to whether client-provided interpreters are competent. If not, the county worker requests their own interpreter.

Question	Yes	No	Comments
Does the county use a Release of Confidentiality Information form for client-provided interpreters?	Yes		The release of information is captured in form HSA 31.
If there is not a Release of Confidentiality Information form, how and where is the client-provided interpreter documented?			n/a
Does the county use the CDSS-translated forms in the clients' primary languages?	Yes		The case files reviewed had the appropriate translated forms in the client's preferred language.
Is the information that is to be inserted into NOA translated into the client's primary language?		No	The non-English case files reviewed outside of Spanish were missing translated information in the client's preferred written language.
If language to be inserted into NOA is not available, is there a procedure to ensure information translated to client's primary language?		No	Response needed?
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	Yes		Auxiliary aids and services are available at each office upon the participant's request.
Does the county identify a client with a disability (physical, mental, or learning)?	Yes		During interviews, managers and staff stated that they ensure the participant's needs are always met regardless of the accommodation needed.
Does the county assist clients with self-identifying a disability?	Yes		

Question	Yes	No	Comments
Does the county have a policy and procedure in place for assisting clients with a disability (physical, mental, or learning)?	Yes		If a San Joaquin County HSA worker suspects an applicant/recipient has any sort of disability, they are sent for further evaluation. If the worker can make the accommodations themselves, the accommodation(s) is made.
Does the county offer reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes		See comments above.
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes		County workers stated that they read information slowly and carefully to the client, frequently checking for understanding to ensure the client understands.
Does the county offer a screening for learning disabilities?	Yes		Screening is offered in the Employment Services program at orientation.
Is there an established process for offering a screening?	Yes		Screening is offered in the Employment Services program at orientation (or as needed by the applicant/recipient).
Is the client identified as having a learning disability referred for an evaluation?	Yes		Clients are referred to the local junior college for further examination.

B. Corrective Actions

Area of Findings	Corrective Actions
Notices of Action	When San Joaquin County HSA uses translated forms and materials, such as Notices of Actions that contain spaces in which the county must insert information for the client, such information must be in the primary language of the client. Div. 21-115.2

a. Recommendation

In conjunction with Health and Human Services Agency, California Department of Social Services offers a form entitled, "Notice of Language Services." The most recent version of this form, updated in December 2016, informs recipients of the following:

This information is being sent to you because it may impact your eligibility for public benefits and may require you to respond by a certain date. If you do not understand the information, call your county worker. You have the right to language assistance services at no cost to you.

The three-page notice provides the above information in 18 non-English languages.

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services, Foster Care, and/or Kingap
Ethnic origin documentation	SJ 100, Form ACS 45	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, CWS/CMS
Method of identifying client's primary language	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative	SJ100, CWS/CMS

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services, Foster Care, and/or Kingap
Method of documenting client's primary language	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative
Method of providing bilingual services and documentation	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative
Client provided own interpreter	Worker verbally informed client of the possibility of ineffective communication and documents interaction in case narrative	Worker verbally informed client of the possibility of ineffective communication and documents interaction in case narrative	Worker verbally informed client of the possibility of ineffective communication and documents interaction in case narrative	Worker verbally informed client of the possibility of ineffective communication and documents interaction in case narrative	Worker verbally informed client of the possibility of ineffective communication and documents interaction in case narrative
Method to inform client of potential problem using own interpreter	HSA 31	HSA 31, *not found	HSA 31 *not found	HSA 31	HSA 31
Release of information to Interpreter	HSA 31	HSA 31	HSA 31	HSA 31	HSA 31

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services, Foster Care, and/or Kingap
Individual's acceptance or refusal of written material offered in primary language	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative	SJ 100, Case narrative
Documentation of minor used as interpreter	Minors not used	Minors not used	Minors not used	Minors not used	Minors not used
Documentation of circumstances for using minor interpreter temporarily	Minors not used	Minors not used	Minors not used	Minors not used	Minors not used
Method of identifying client's disability	ACS 48, Statement of Facts, Case narrative	Case narrative	Case narrative	Case narrative	Case narrative
Method of documenting clients' disability (physical, mental, or learning)	Case narrative	Case narrative	Case narrative	Case narrative	Case narrative
Method of offering a reasonable accommodation to the client with disability	Case narrative	Case narrative	Case narrative	Case narrative	Case narrative

How item is Documented Item	Adult Programs (IHSS and/or APS)	CalWORKs & Employment Services	Non-Assistance CalFresh	Fraud	Children Services, Foster Care, and/or Kinship
Method of documenting clients' reasonable accommodation	Case narrative	Case narrative	Case narrative	Case narrative	Case narrative

B. Corrective Actions

Areas of Action	Corrective Action
Documentation if client provided own interpreter	When applicants/recipients provide their own interpreter, the CWD shall ensure that the applicants/recipients are informed of the potential problems for ineffective communication. The CWD shall document in the case record that the applicants/recipients were so informed. Div. 21-116.23
Documentation of interpreter signed confidentiality statement	Consent for the release of information shall be obtained from applicants/recipients when individuals other than CWD employees are used as interpreters and the case record shall be so documented. Div. 21-116.24
Documentation of primary language	Each agency shall ensure that case record identification shows the applicant's/recipient's ethnic origin and primary language. Div. 21-201.21
Documentation that bilingual services were provided	Document the method used to provide bilingual services, e.g., assigned worker is bilingual, other bilingual employee acted as interpreter, volunteer interpreter was used, or client provided interpreter. Div. 21-116.22

Areas of Action	Corrective Action
General	San Joaquin County HSA must ensure that proper documentation is kept in the file that identifies all the required elements to ensure compliance. Div. 21-116

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights, cultural awareness, Section 504, and ADA training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Comments
Are employees trained in the requirement of Section 504 and ADA?	Yes		San Joaquin County staff is trained annually in ADA accommodation and non-discrimination against persons with disabilities.
Do employees receive continued Division 21 Training?	Yes		San Joaquin County staff receive Division 21 training annually.
Do employees understand the county policy regarding a client's rights and procedure to follow when receiving a discrimination complaint?	Yes		All employees interviewed were aware of the proper complaint process.
Does the county provide employees Cultural Awareness Training?	Yes		Cultural awareness training is provided in conjunction with other annual civil rights trainings.
Do the CSW's have an understanding of Multi-Ethnic Placement Act (MEPA)?	Yes		MEPA training is annually provided training to CSWs.
Do the employees seem knowledgeable about the	Yes		

Interview questions	Yes	No	Comments
predominant cultural groups receiving services in their area?			
Does the county provide training on how to identify clients with disabilities (physical, mental & learning)?	Yes		San Joaquin HSA has always made a concerted effort to accommodate clients with disabilities. Accessibility training is provided as needed.
Do employees receive training on reasonable accommodation for clients with disabilities?	Yes		See comments above.
Do the employees understand the county policy regarding a client's right to a reasonable accommodation?	Yes		See comments above.

B. Corrective Actions

None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews, Civil Rights Coordinator, and Program Manager Surveys

Interview and review areas	Yes	No	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes		All staff interviewed were able to distinguish the different types of complaint without issue.

Interview and review areas	Yes	No	Findings
Do the employees know who the Civil Rights Coordinator is?	Yes		
Do the employees know the location of the Civil Rights poster "Everyone is Equal... (Pub 86)" with information as to how and where the clients can file a discrimination complaint?	Yes		All staff interviewed knew a poster with the Civil Rights Coordinator's information was available in the lobby.
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes		No outstanding cases.

B. Corrective Action

None

IX. VENDOR CONTRACTS

Counties are required to ensure contracted services with contractors, vendors, consultants, and other providers of service, who receive state or federal assistance, include the assurance of compliance agreement.

A. Contracts Review

Number of Contracts Reviewed	10
Number of Contracts w/Assurance of Compliance Agreement	10

B. Corrective Action

None

X. CALL CENTER EVALUATION

County Call/Service Centers are evaluated to ensure services provided are nondiscriminatory toward non-English speaking clients and clients with a disability (physical, mental, or learning).

A. Findings from Call/Service Center site visit and interviews.

Question	Yes	No	Comments
Does the county have a Call Center/Service Center?		No	
Is the Call Center/Service Center publically accessible to clients?			n/a
Does the Call Center/Service Center answer calls for the entire county, by district, or regional office?			n/a
Does the Call/Service Center have an Interactive Voice Response system?			n/a
If so, does the Interactive Voice Response system have language options for all county threshold languages?			n/a
Does the Interactive Voice Response system have an option to request free interpretive services?			n/a
Is the Call/Service Center accessible to clients with a disability (hearing impaired, physical, mental, or learning)?			n/a
Does the Call/Service Center accommodate clients with a disability (physical, mental, or learning)?			n/a

XI. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The Civil Rights Unit did not receive a response from advocate groups after being notified of the compliance review.

XII. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The San Joaquin County Human Services Agency Civil Rights Compliance Plan for the period May 1, 2016 – April 30, 2017, was received on March 17, 2017. It is approved as submitted.

XIII. CONCLUSION

The CDSS reviewer found the San Joaquin County Human Services Agency staff warm, welcoming, informative and very supportive. Particular thanks to Melissa Sangalang, Civil Rights Coordinator, for organizing the details of the review. In each office, staff were very helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the San Joaquin County Human Services Agency in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The San Joaquin County Human Services Agency must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.